

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE

1615 M STREET, N.W.

SUITE 400

WASHINGTON, D.C. 20036-3215

—  
(202) 326-7900

FACSIMILE:

(202) 326-7999

July 29, 2019

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
(All Actions)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”), concerning the Court’s sealed orders dated July 22, 2019. Those orders require Saudi Arabia to produce certain documents by Thursday, September 5, 2019 (45 days after July 22). Saudi Arabia respectfully requests that the deadline be extended by 29 days, to and including Friday, October 4, 2019.

The reason for the requested extension is that the period for compliance with the orders includes the religious holiday of the Hajj, the annual pilgrimage to Mecca. During the Hajj, Muslims from all over the world travel to Mecca, and Saudi Arabia’s government acts as their host and takes responsibility for their health and safety. In 2018, more than two million pilgrims traveled to Mecca. In 2019, the Hajj itself will begin on Friday, August 9, and end on Wednesday, August 14. The two weeks surrounding those dates, beginning at latest on Monday, August 5 and ending at earliest on Friday, August 16, are a public holiday during which government offices in Saudi Arabia will be closed.\* In addition, several government agencies relevant to the Court’s orders, including the General Authority of Civil Aviation, the Ministry of Islamic Affairs, the Ministry of Education, the Ministry of Interior, and the Presidency of State Security, have responsibilities related to the Hajj that will put considerable demands on the time of their employees during the entire month of August.

---

\* The period of the public holiday closure is customarily extended to include surrounding days and will likely run from Sunday, August 4 through Saturday, August 17, 2019.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn  
July 29, 2019  
Page 2

Saudi Arabia has already begun the process of searching for documents to comply with the Court's orders and intends to make as much progress as possible before the public holiday begins. Where feasible, Saudi Arabia will produce documents on a rolling basis. Nevertheless, we believe the requested extension will be necessary to achieve substantial compliance with the production ordered by the Court. This is Saudi Arabia's first request for an extension of this deadline. We have conferred with counsel for Plaintiffs and are authorized to state that they have no objection to this request.

Although this Court's orders are currently under seal pending the submission of proposed redactions by the parties, this letter is being filed on the public docket because it does not refer to any information designated as confidential.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

Attachment

cc: The Honorable George B. Daniels (via facsimile)  
All MDL Counsel of Record (via ECF)